

Michael A. Battle
William R. Martin (admitted *pro hac vice*)
Michelle N. Bradford (admitted *pro hac vice*)
David S. Slovick
Erin C. Steele (admitted *pro hac vice*)
BARNES & THORNBURG LLP
555 12th Street NW, Suite 1200
Washington, DC 20004-1275
mbattle@btlaw.com
(202) 371-6350
billy.martin@btlaw.com
(202) 371-6363
mbradford@btlaw.com
(202) 408-6922
dslovick@btlaw.com
(646) 746-2019
esteele@btlaw.com
(202) 408-6932

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

JAMES VELISSARIS,

Defendant.

No. 1:22-cr-00105-DLC

Hon. Denise L. Cote

**DEFENDANT'S APPLICATION TO
FILE EXHIBITS UNDER SEAL**

The Defendant, James Velissaris ("Mr. Velissaris" or "Defendant"), by and through his undersigned counsel, respectfully files this application to file Exhibits A and B to his Reply Memorandum of Law in Support of his Motion to Withdraw his Guilty Plea under seal. Exhibit A contains Mr. Velissaris' plea agreement with the government dated November 20, 2022. Exhibit B contains highly sensitive information regarding the circumstances surrounding Mr. Velissaris' guilty plea. Sealing this document will protect the sensitivity of the information and the identities of the third parties involved.

For these reasons, Mr. Velissaris respectfully requests that the Court grant his application to file Exhibits A and B to his Reply under seal.

Dated: April 5, 2023

Respectfully submitted,

/s/ Michael A. Battle

BARNES & THORNBURG LLP
555 12th Street N.W., Suite 1200
Washington, DC 20004
Michael A. Battle (SDNY Bar Code No. MB9289)
William R. Martin (admitted *pro hac vice*)
Michelle N. Bradford (admitted *pro hac vice*)
Erin C. Steele (admitted *pro hac vice*)
BARNES & THORNBURG LLP
555 12th Street NW, Suite 1200
Washington, DC 20004
mbattle@btlaw.com
(202) 371-6350
billy.martin@btlaw.com
(202) 371-6363
mbradford@btlaw.com
(202) 408-6922
esteele@btlaw.com
(202) 408-6932

- and -

/s/ David Slovick

David Slovick
BARNES & THORNBURG LLP
390 Madison Ave.
12th Floor
New York, NY 10017
david.slovick@btlaw.com
(646) 746-2019

Attorneys for Defendant James Velissaris

The defendant shall immediately email the documents to the Court's Chambers and to the Government. No decision to seal can be made without seeing the documents.

*James Velissaris
April 6, 2023*